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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 CLARK COUNTY EDUCATION  
10 ASSOCIATION,

Case No.: 2:22-cv-00964-GMN-DJA

11 Plaintiff,

12 vs.

13 ALEXANDER ROCHE, an individual;

14  
**STIPULATION AND  
[PROPOSED] ORDER FOR  
EXTENSION OF TIME**

15 **[SECOND REQUEST]**

16 ALEXANDER ROCHE, an individual;

17 Counter Claimant,

18 vs.

19 CLARK COUNTY EDUCATION  
20 ASSOCIATION, a labor union and employer;  
CLARK COUNTY STAFF ORGANIZATION,  
21 a labor union; DOE BUSINESS ENTITIES 1-  
10; JOHN VELLARDITA, Executive Director  
22 of CCEA, an individual, in his individual and  
official capacities; and DOE INDIVIDUALS 1-  
23 50.

24 Counter Defendants.

25  
26 IT IS HEREBY STIPULATED AND AGREED by and between Defendant / Counter  
27 Claimant, ALEXANDER ROCHE and Plaintiff / Counter Defendants CLARK COUNTY  
28

1 EDUCATION ASSOCIATION, CLARK COUNTY STAFF ORGANIZATION, and JOHN  
 2 VELLARDITA, by and through their undersigned counsel, that Defendant / Counter Claimant  
 3 ALEXANDER ROCHE may have additional time within which to respond to Plaintiff / Counter  
 4 Defendants' *Special Motion to Dismiss* and *Motion to Dismiss* from Friday August 19, 2022 to  
 5 **Monday, August 21, 2022.** This is the SEcond request for an extension. Per Judge Navarro's  
 6 chambers policies, the Proposed Order is attached herewith as **Exhibit 1.**

<p>8 DATED this 19<sup>th</sup> day of August, 2022</p> <p>9</p> <p>10 By: <u>/s/ Robert S. Melcic, Esq.</u> ROBERT    S. MELCIC, ESQ. Nevada State Bar No.    14923    11 3315 E. Russell Rd.    Ste. A4-271    Las Vegas, NV 89120    Phone: (702) 526-4235    Clerk: (725) 577-8013    Email: robertmelcic@gmail.com <i>Attorney for    Alexander Roche</i></p>	<p>8 DATED this 19<sup>th</sup> day of August, 2022</p> <p>9</p> <p>10 By:    DANIEL MARKS, ESQ.    Nevada State Bar No. 002003    610 South Ninth Street    Las Vegas, Nevada 89101    Phone: (702) 386-0536    Fax: (702) 386-6812    Email: office@danielmarks.net  <i>Attorney for Clark County Education Association,    Clark County Staff Organization, and John Vellardita</i></p>
<p>17 DATED this 19<sup>th</sup> day of August, 2022</p> <p>18</p> <p>19 By: <u>/s/ Steven Sorensen, Esq.</u> STEVEN    SORENSEN, ESQ. Nevada State Bar No.    15472    20 4230 McLeod Drive    Las Vegas, Nevada 89121    Phone: (702) 473-1020    Fax: (702) 866-6134    Email: ssorensen@ccea-nv.org <i>Attorney for    Clark County Education Association</i></p>	<p>17 DATED this 19<sup>th</sup> day of August, 2022</p> <p>18</p> <p>19 By: <u>/s/ Adam Levine, Esq.</u>    ADAM LEVINE, ESQ.    Nevada State Bar No. 004673    610 South Ninth Street    Las Vegas, Nevada 89101    Phone: (702) 386-0536    Fax: (702) 386-6812    Email: alevine@danielmarks.net  <i>Attorney for Clark County Education Association,    Clark County Staff Organization, and John Vellardita</i></p>

25 **IT IS SO ORDERED *nunc pro tunc.***

26 Dated this 23 day of August, 2022.

27  
  
 28 Gloria M. Navarro, District Judge  
 UNITED STATES DISTRICT COURT